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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER PETRAS,

Plaintiff,

v.

**NAVY FEDERAL CREDIT UNION;
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; EQUIFAX
INFORMATION SERVICES LLC; AND,
EXPERIAN INFORMATION SOLUTIONS,
INC.,**

Defendants.

CASE NO. 2:20-cv-00874-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEPOSITIONS OF
MARIA PETRAS AND KIMBERLY
WOJCIECHOWSKI**

HON. BRENDA WEKSLER

Defendant JPMorgan Chase Bank N.A. (“Chase”) and Plaintiff Christopher Petras
 (“Plaintiff”) (collectively, the “Parties”) hereby stipulate as follows:

1. The Court issued its Scheduling Order on July 8, 2020, and extended those
 dates on October 14, 2020, December 11, 2020, and April 30, 2021. (ECF Nos. 18, 37,
 52, 63).

2. The current discovery deadline is June 7, 2021. (ECF No. 63).

3. The Parties previously agreed for Plaintiff’s witnesses Maria Petras and
 Kimberly Wojciechowski to be deposed on June 4, 2021. Experian Information Solutions,

1 Inc. ("Experian") noticed the depositions of Ms. Petras and Ms. Wojciechowski for June 4,
2 2021.

3 4. Experian set up the remote deposition proceeding and acquired a remote
4 court reporter and videographer.

5 5. Experian and Plaintiff settled their dispute on June 3, 2021. (ECF No. 68).

6 6. The Parties jointly request that this Court permit Defendant Chase to depose
7 Ms. Petras and Ms. Wojciechowski no later than June 15, 2021, after the close of
8 discovery, to allow Chase time to serve new deposition notices and acquire a remote court
9 reporter and videographer.

10 7. The Parties do not seek to change any other dates in the operative
11 Scheduling Order through this Stipulation, nor is any additional discovery permitted after
12 the current discovery cut-off, with the exception of the depositions of Ms. Petras and Ms.
13 Wojciechowski.

14 Dated: June 7, 2021

15 BALLARD SPAHR LLP

KIND LAW

17 By: /s/ Joel E. Tasca

By: /s/ Michael Kind

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22 By: /s/ Matthew Loker

23 Matthew Loker
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25 *Attorneys for Plaintiff*

ORDER

The above-set stipulated agreement to depose Maria Petras and Kimberly Wojciechowski no later than June 15, 2021 is granted.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: June 11, 2021